

Vorys, Sater, Seymour and Pease LLP  
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IN THE UNITED STATES BANKRUPTCY COURT  
FOR SOUTHERN DISTRICT OF NEW YORK

In re:	:	
	:	Case No. 05-44481 (RDD)
DELPHI CORPORATION, <u>et al.</u>	:	(Chapter 11)
	:	Jointly Administered
Debtors.	:	

**RESPONSE OF VORYS, SATER, SEYMOUR AND PEASE, LLP TO DEBTORS'  
THIRTEENTH OMNIBUS OBJECTION (SUBSTANTATIVE) PURSUANT TO 11 U.S.C.  
§ 502(b) AND FED.R.BANKR.P. 3007 TO CLAIMS**

Now comes Vorys, Sater, Seymour and Pease LLP (“Vorys”) creditor and party in interest herein by counsel, Randall D. LaTour, Partner, and responds to the Thirteenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502(b) and Fed.R.Bankr.P. 3007 (“Thirteenth Omnibus Claims Objection”) and states as follows:

1. Vorys timely filed its proof of claim on August 4, 2006, attaching a summary of unpaid invoices, totaling \$54,050.82 (general unsecured) (“Proof of Claim”). Under number 8 on the Proof of Claim, in bold letters, Vorys indicated \*\*Additional supporting document is proprietary and will be provided only upon request.

2. On January 22, 2007, Thomas Soyars, who indicated he worked at Delphi, telephoned me and requested detailed invoices supporting the Proof of Claim. Mr. Soyars telephone number was given as (248) 265-4307. After my paralegal, Cindy Fricke, spoke with Mr. Soyars he indicated that Delphi needed the detailed invoices to be sent to Ms. Geanine

DeLuca of Delphi Corporation, 900 Tower Drive, Suite 900, Troy Michigan 48098 Mail Code (480-900-001). The detailed invoices were sent on February 12, 2007.

3. On April 17, 2007, Paola Vespa, from Sedgwick Claims Management Services Inc. ("Sedgwick"), telephoned and left a message regarding questions on three of the invoices earlier provided. Ms. Vespa's telephone number is (248) 603-8165. The difference in what Delphi showed on account and what Vorys' claim showed aggregated approximately \$30.00.

4. On April 19, 2007, Cindy Fricke, Vorys' Certified Bankruptcy Paralegal, had a conference with Ms. Vespa who stated that she worked for Debtors accountants, Sedgwick. In this conference the questions on the three invoices were answered to Ms. Vespa's satisfaction and Ms. Vespa indicated that she would provide Vorys, more specifically Ms. Fricke, with written documentation indicating that the amount of Vorys' claim was accurate and the claim would be allowed.

5. While waiting for written confirmation from Sedgwick, Vorys learned of Debtors' Thirteenth Omnibus Objection to Claims, in which Vorys' Claim was included.

6. Vorys reviewed the objections to claims and found that, in fact, 8 days after Debtors' accountants, Sedgwick, had verbally verified that Vorys claim was accurate and would be allowed, Debtors nonetheless filed an objection to Vorys claim. Incredibly, despite the dispute being over approximately \$30.00, the Debtors' recommended that Vorys' claim of \$54,050.82 be modified to \$648.10.

7. All documentation earlier provided to Debtors shall be provided to this Court prior to the hearing on this matter. Vorys' general unsecured claim should be allowed in the amount of \$54,050.82.

WHEREFORE, Vorys, Sater, Seymour and Pease LLP requests the Debtors' Thirteenth Omnibus Claims Objection to Vorys, Sater, Seymour and Pease LLP's claim be denied and that

Vorys' general unsecured claim be allowed in the amount of \$54,050.82 and further, requests such other relief as this Court deems just.

Dated: May 10, 2007

Respectfully submitted,

By: /s/Randall D.

LaTour

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**CERTIFICATE OF SERVICE**

The undersigned, being a partner in Vorys, Sater, Seymour and Pease LLP hereby certifies that a copy of the foregoing Response to Debtors' Thirteenth Omnibus Objection to Proofs of Claim was served upon the following parties on this the 10<sup>th</sup> day of May, 2007:

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/s/Randall D. LaTour

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